

## STANDARD OPERATING PROCEDURE

SUBJECT: Waste Propellant Disposal

SOP NO. S-1300

REV N/C

EFFECTIVE: 4/11/80

PG 1 OF 3

APPROVAL:

CONCURRENCE:

RESPONSIBILITIES

1. The Manufacturing Department collects, stores and disposes of the waste propellant.
2. The Safety Director, or his designated representative, inspects and approves every disposal set-up prior to ignition.

COLLECTION

1. All wastes shall be removed daily from the manufacturing activities at which they have accumulated.
2. Waste Q.C. test specimens and machined and miscellaneous waste propellant shall be collected in polyethylene bags. Each bag shall contain a maximum of 20 lb. of a single type of propellant.
3. The bags must be carefully sealed with masking tape. The waste shall be identified on the masking tape (Example: "TPJ3000" or "2509 & 2510" or "2178" or "2217 & 2218" or "2405 & 2178").
4. Rejected propellant in plastic tubes shall be collected in wood boxes or steel cans. The longer, "RoCat" grains shall be broken into lengths of 10 inch maximum. This applies only to 2178 propellant and must be done remote from other waste. (Storage bunker doors closed!!). Apply masking tape on the exteriors of the cans or boxes and identify the type of waste.

STORAGE

1. The floor of the waste storage bunker must be swept and maintained free of all debris, in order to see and identify any spilled propellant particles. This is extremely important, since propellant particles can be ignited when trapped under-foot, or under a sliding box or can.
2. Polyethylene bags of waste shall also be contained within wood boxes or steel cans (labeled as in 4 above). The bags must be handled with great care to prevent tearing and the possible spillage of waste onto the floor. Torn bags shall be inserted into new bags, sealed and the waste identified.

DISPOSAL

1. Notify the UPCo Safety Director, followed by the Maricopa County Health Dept. (258-6381) of the approximate quantity of waste to be burned, planned time of ignition, and location (north of Happy Valley Rd. at 7th St.), 2 - 6 hours before-hand.
2. Notify the Rural Metro Fire Department (974-2321) and the Deer Valley Airport Tower (261-4872) of the location and planned time of ignition, 10 - 15 minutes prior to ignition.

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PG 2 OF 3

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3. Burn all accumulated waste (50lb. minimum) regularly, the first day of the work week normally Monday, 1 - 2 PM.
4. Inspect the burn area very carefully prior to placing waste thereon. Assure there is no warm or smoldering residue from the previous burn.
5. Only identified waste propellant shall be burned. No powders of any kind shall be included. Do not include questionable material. Refer all questions to the UPCo Safety Director.
6. The waste shall be uniformly spread, approximately 2 inches thick by 2 to 4 feet wide, and of sufficient length to accommodate the total. It is permissible for several workers to spread the large pieces of waste in the burn area (after the area has been carefully inspected). However, all but two workers must withdraw a minimum 300 feet from the burn area prior to completing the set-up. These two workers then spread the bagged fine particle waste in a uniform thin layer over the larger pieces. Very carefully avoid walking on any waste particles. Remove the polyethylene bags from the area for disposal by other means.
7. The burn shall be remotely initiated by electrical means. The electrical continuity of the entire extension cord must be checked prior to spreading the waste material and the reel of cord taken to the waste area. The igniters (use 2 igniters, wired in parallel) shall be small polyethylene bags containing propellant particles and Atlas electric matches. One of the two workers remaining at the burn area connects the igniters to the extension cord and inserts them under some fine particles of waste at the end of the spread nearest to the electric power source. The second worker, ready to assist, observes from a distance of 100 feet. The following specific sequence must be followed by the one worker:
  - a. Move the ignition end of the cable a minimum 100 feet from the waste material.
  - b. Short the end of the cable that will be connected to the power source and attach it to a driven ground rod.
  - c. Remove the shorting clips from the two electric matches and connect them in parallel.
  - d. Connect the electric match leads to the cable leads.
  - e. Insert the electric matches in the igniter bags.
  - f. Carry the two igniters to the end of the waste and carefully insert them.
8. Sentries, carrying water spray equipment and shovels to combat potential fires, shall be dispatched to a minimum distance of 300 feet from the burn area, at the 3, 9. and 12 o'clock positions. The two workers at the burn area unwind the extension cord and withdraw to the electric power source (car battery or 110V/AC receptacle) at the 6 o'clock position (300 feet minimum).

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9. The worker at the electric power source responsible for the disposal work asks each of the sentrys for an "all clear" to assure there are no potential intruders in the immediate area. When that condition is met, he initiates the burn. If there is a mis-fire, short and ground the power in-put end of the electric cable. Do not approach the waste material for 30 minutes, minimum.
10. Extinguish all fires if any were discovered after the burn. Call the Rural Metro Fire Dept. if any fire appears to be out of control.
11. Do not approach the burn area for 24 hours. The area must be searched for any un-burned waste, and that material must then be returned and properly stored in the burn bunker.

U P Co

UNIVERSAL PROPULSION CO.

a TALLEY INDUSTRIES Company

29 February 1980

Maricopa County Department of Health Services  
Bureau of Air Pollution Control  
1845 E. Roosevelt  
P. O. Box 2111  
Phoenix, Arizona

WEH-033-02290

Attention: Warren Casters

Dear Sir:

We enclose herewith our Burning Permit Application for the disposal of Solid Propellant, Class B Explosives. The following specific information is also provided:

1. Our propellant waste is essentially the same as that burned by our parent company, Talley Industries, north end of Greenfield Road, Mesa.
2. This material burns vigorously (does not detonate). It represents a serious fire hazard when allowed to accumulate and must be burned regularly, all year. *200 - 1000*.
3. Approximately ~~100~~ *200* lb. per week of this waste is generated by our plant. Our disposal procedure specifies that all of the accumulated waste shall be burned regularly on the first day of the work week (normally Monday) between 1 and 2 PM.
4. The combustion products of this material are:

| <u>Gases</u>     | <u>pbw</u> |
|------------------|------------|
| H <sub>2</sub> O | 25         |
| CO <sub>2</sub>  | 35         |
| N <sub>2</sub>   | 3 to 4     |
| HCl              | 12         |
| NO <sub>x</sub>  | 1 to 2     |



UNIVERSAL PROPULSION CO.

a TALLEY INDUSTRIES Company

Maricopa County Dept. of Health Services  
Warren Casters  
Page 2

| <u>Solids</u>           | <u>pbw</u> |
|-------------------------|------------|
| $\text{Al}_2\text{O}_3$ | 20         |
| KCl                     | 1-1/2      |
| $\text{Fe}_2\text{O}_3$ | 1-1/2      |

We also enclose our \$20.00 check for the Burning Permit.

Thank you,

UNIVERSAL PROPULSION COMPANY, INC.

W. E. Hallas  
Safety Director

Enclosure

WEH:cm

MARICOPA COUNTY DEPARTMENT OF HEALTH SERVICES  
DIVISION OF PUBLIC HEALTH

BUREAU OF AIR POLLUTION CONTROL  
1845 E. ROOSEVELT, P.O. BOX 2111, PHOENIX, AZ 85001 PHONE 258-6381

BURNING PERMIT APPLICATION

**NOTE:** 1) Application must be filled out completely before permit can be issued; 2) A separate permit is required for each location not physically connected to another location (a farm divided by a public road will be considered as one location); 3) A fee is required for each permit; 4) Permit will not be issued until fee is received; 5) Prior approval from the fire department for burning sites in the cities of Scottsdale, Glendale and Mesa must be obtained before permit can be granted.

**FEE:** \$20.00 (\$50.00 maximum for 3 or more locations)

**BURNING PERMIT** — Burning permitted during the months of March through October ONLY. High temperature mechanical burner required.

☐ DITCH BANKS ☐ FENCE ROWS

☐ CANAL LATERALS  
WASTE PROPELLANT (UNSTABLE)

**FEE:** \$10.00 (issued for 30-day period)

**TEMPORARY PERMIT**

☐ Tumbleweeds (must be cut, dried, piled in small piles)

☐ Special — for example: land clearance; fire training; pesticide containers; diseased crops (requires prior authorization in writing from County Ag. Agent)

PERMITTEE Universal Propulsion Co. PHONE 869-8067

MAILING ADDRESS 1800 W. Deer Valley Road CITY Phoenix ZIP 85027

LOCATIONS (Specify streets or boundaries. Do NOT use legal descriptions.)

For "Amount of Burning" give approximate total length of ditch banks, canal laterals and fence rows; or approximate acreage of land cleared of tumbleweeds, diseased crops or other vegetation. For other types of burning, specify number or amount of material (such as "50 trees" or "200 pesticide containers").

Identify which fire department(s), if any, has jurisdiction over burning site.

1. Location 25401 N. Central Ave. (N. of Happy Valley Rd. between 7th St. & Central)

Amount of Burning Approx. 100 lb. per week, on Mondays, 1 - 2 PM.

Rural Metro  
Fire Dept. Address Bell Rd. @ Black Canyon Fwy. Phone 939-3111

2. Location \_\_\_\_\_

Amount of Burning \_\_\_\_\_

Fire Dept. Address \_\_\_\_\_ Phone \_\_\_\_\_

3. Location \_\_\_\_\_

Amount of Burning \_\_\_\_\_

Fire Dept. Address \_\_\_\_\_ Phone \_\_\_\_\_

4. Location \_\_\_\_\_

Amount of Burning \_\_\_\_\_

Fire Dept. Address \_\_\_\_\_ Phone \_\_\_\_\_

5. Location \_\_\_\_\_

Amount of Burning \_\_\_\_\_

Fire Dept. Address \_\_\_\_\_ Phone \_\_\_\_\_

(Use back of application for additional locations.)

I HEREBY CERTIFY THAT THE INFORMATION SUPPLIED ON THIS APPLICATION IS CORRECT AND AGREE TO ABIDE BY ALL STIPULATIONS OF THE PERMIT.

Signature of Permittee *W. E. Hallas* Date 2-28-80

W. E. Hallas, Safety Director

# UPCO PEPLAN

Pre-Emergency Plan

Published: April 1982

## EMERGENCY TELEPHONE NUMBERS

ANY EMERGENCY-----777

|                                              |       |          |
|----------------------------------------------|-------|----------|
| PARAMEDICS (PHOENIX FIRE DEPT.)              | ----- | 253-1191 |
| AMBULANCE (Associated)                       | ----- | 246-4357 |
| DEER VALLEY EMERGICENTER (Greenway & I-17)   | ----- | 993-8500 |
| John C. LINCOLN HOSPITAL                     | ----- | 943-2381 |
| AIR EVAC (J C LINCOLN HOSP. & BAPTIST HOSP.) | ----  | 247-3822 |
| RURAL METRO FIRE DEPT.                       | ----- | 939-3111 |
| MARICOPA COUNTY SHERIFF                      | ----- | 256-1000 |
| ARIZONA DEPT. of PUBLIC SAFETY               | ----- | 262-8011 |
| ARIZONA PUBLIC SERVICE                       | ----- | 271-7171 |



## OBJECTIVES AND RESPONSIBILITIES

This plan has been established for coping with some specific types of emergencies. To assure the effectiveness of this plan, UPCo:

- Established this written policy
- Created and will sustain employee interest
- Will assure readiness of fire fighting equipment
- Will train employees for emergency action in the following:
  - Fire
  - Explosion
  - Electrical Storms
  - Employee's serious injury, heart attack, stroke, or convulsions
  - Electrical Power Outage
- Will be able to restore buildings, equipment and processes following an incident

It is important that operations during an emergency and the following restoration period be handled by a Coordinator. The Coordinator at UPCo is the Facilities and Safety Director, or, in his absence, a specifically designated alternate. The Coordinator reports directly to the UPCo President in these matters.

### FIRE

The Department of Defense defines four types of fires involving explosives. Three of these are applicable to UPCo's operations (numbers 1, 3 and 4), and the buildings are identified by the appropriate fire fighting symbols.

In case of fire in any of the facilities, the UPCo Coordinator shall be notified immediately and the following Fire Fighting Plan will be put into effect:





The actions for fighting of fires and/or the evacuation of buildings depends upon the specific building, functions performed therein, and status at the time the emergency arises. Generally, all fires starting IN THE VICINITY of ammunition or explosives shall be reported and be fought immediately with all available means and without awaiting specific instructions. However, if the fire INVOLVES EXPLOSIVE MATERIAL or is supplying heat to it, or if the fire is so large that it cannot be extinguished with the equipment at hand, the personnel involved shall evacuate and seek safety.

The local fire fighting forces who respond to the emergency shall be informed of the known hazards and conditions existing at the scene before they are allowed to approach the fire. That is, when a fire is discovered IN AN EXPLOSIVES LOCATION, one messenger shall be dispatched to telephone the local fire fighters, and he is then to go in the direction from which the fire department is expected to approach, and inform them of the hazards upon their arrival. If the fire is in a SYMBOL 1 BUILDING that contains propellant, they will be permitted no closer than 2000 feet (approximately one-half mile) from the fire.

The PUBLIC shall not be permitted closer than 2000 feet (approximately one-half mile) from ANY fire.

SYMBOL 1:

BUILDINGS:      Propellant Mix/Cast  
                     Propellant Curing Ovens  
                     Tool Assembly/Disassembly (loaded clusters)  
                     Assembly & Packout  
                     Cartridge Load

Action:            If a fire breaks out during mix, cast, or cure of propellants, the "clusters" can be expected to yield essentially an explosion because of the containment of propellants within high strength hardware. Therefore, no attempt to fight these Symbol 1 fires shall be made. All personnel shall immediately proceed, with reasonable haste, to a point approximately 2000 feet from the fire.



The Coordinator decides when a Symbol 1 hazard no longer exists and directs appropriate action by local fire fighters and/or UPCo personnel.

If a fire breaks out in one of these buildings when it does not contain propellant, it shall be fought with the means at hand; i.e., extinguishers, water, etc., and the local fire fighters shall be called.

SYMBOL 3:

BUILDINGS:

Test  
Propellant Machine Shop  
X-Ray  
Lining & Propellant Q.C.  
Tool Assembly/Disassembly (individual grains)

Action:

Personnel discovering a fire in these locations shall call the local fire fighters and shall attempt to put out the fire with equipment at hand, provided the fire is just beginning. If the fire gets out of hand, or directly involves explosives, the building shall be abandoned and UPCo personnel shall immediately withdraw to a distance of 600 feet (approximately one block) or more from the fire. The local fire fighting forces should concentrate on preventing the spread of fire to other buildings.

SYMBOL 4:

BUILDINGS:

Raw Material Stores  
Solvent Stores  
Office Building

Action:

Fires in these locations shall be fought with all means at hand and the local fire fighting forces shall be called.



## EMPLOYEE'S SERIOUS INJURY, HEART ATTACK, STROKE, OR CONVULSIONS

The serious injury or sudden illness of personnel shall be handled in the following manner:

1. Summon UPCo employee(s) qualified to administer first aid (one who has a current certificate from the American Red Cross Multimedia Course).
2. Call for emergency medical evacuation and professional medical care.
3. Notify the UPCo Coordinator immediately.
4. The qualified UPCo employee(s) administers first aid in specific compliance with the instructions in the book, "American Red Cross Standard First Aid & Personal Safety," Second Edition, 1979.

### Serious Injuries

|                         |                    |     |
|-------------------------|--------------------|-----|
| Wounds                  | Chapter 2.....Page | 18  |
| Specific Injuries       | " 3.....Page       | 45  |
| Shock                   | " 4.....Page       | 60  |
| Respiratory Emergencies | " 5.....Page       | 66  |
| Choking                 | " 6.....Page       | 95  |
| Poisoning               | " 7.....Page       | 99  |
| Drug Abuse              | " 8.....Page       | 126 |
| Burns                   | " 9.....Page       | 144 |
| Cold Exposure           | " 10.....Page      | 160 |
| Heat Stroke             | " 11.....Page      | 166 |

### Heart Attack

|                  |               |     |
|------------------|---------------|-----|
| Signs & Symptoms | " 12.....Page | 171 |
| First Aid        | " 12.....Page | 171 |

### Stroke

|                  |               |     |
|------------------|---------------|-----|
| Signs & Symptoms | " 12.....Page | 172 |
| First Aid        | " 12.....Page | 172 |

### Convulsions

|                  |               |     |
|------------------|---------------|-----|
| Signs & Symptoms | " 12.....Page | 174 |
| First Aid        | " 12.....Page | 175 |



## EXPLOSION

Proceed thus, if an explosion occurs:

1. Provide first aid and/or medical evacuation for injured personnel.
2. Notify the UPCo Coordinator immediately.
3. Call the Rural Metro Fire Department to combat potential fire spread.

The Coordinator shall:

4. If safe to do so, turn off the electrical power and propane gas lines to the affected building(s).
5. Dispatch two-man teams of employees as sentrys to blockade the roads into UPCo property. ONLY UPCo personnel, government agencies' officials, and fire department units will be allowed to pass through these blockades.
6. Notify the Maricopa County Sheriff and Arizona OSHA.

## ELECTRICAL STORMS

Notify the UPCo Coordinator of the existence of electrical storms and:

1. Stay indoors. You are particularly safe within the large metal frame buildings.
2. If in an automobile, stay there, or, if close to an UPCo building, quickly enter the building for protection from the storm.
3. Do not stand near trees, poles, wire fences, or other tall objects if the storm arrives while you are outdoors. Avoid high places. Form as small and as low a target as possible by kneeling on the ground. Seek shelter quickly if you are reasonably close to a building or automobile.



## ELECTRICAL POWER OUTAGE

There are two types of electrical power outage at the UPCo Happy Valley facilities:

Type I - Total power failure at all office, manufacturing, and test facilities.

Response - Verify that the power failure includes all facilities, then report the problem to Arizona Public Service at 271-7171. Request expedited repair service because of the effect of the outage on UPCo's operations.

Type II - Power failure at one or more of the buildings, but normal power at the other buildings.

Response - This is an UPCo problem and the Coordinator shall be notified immediately. The failure point(s) (switching gears, fuses, circuit breakers, underground cables, etc.) will be isolated and repaired by QUALIFIED UPCo and/or contractor personnel.



SITE: UNIVERSAL PROPELLSIONLOCATION: Phoenix, ArizonaEPA ID: AZD980814479PHOTO TAKEN BY: D. SHANEDATE: 3/19/84PHOTO NO: 1PHOTO TAKEN FROM ExplosivesStorage Bunker Area

FACING TOWARDS

the East

COMMENTS: Storage Bunker  
used to store waste  
solid propellants.

SITE: UNIVERSAL PROPELLSIONLOCATION: Phoenix, ArizonaEPA ID: AZD980814479PHOTO TAKEN BY: D. SHANEDATE: 3/19/84PHOTO NO: 2PHOTO TAKEN FROM ExplosivesStorage Bunker Area

FACING TOWARDS

the East

COMMENTS:





SITE: UNIVERSAL PROPUSSION  
LOCATION: Phoenix, Arizona  
EPA ID: AZD980814479  
PHOTO TAKEN BY: D. SHANE  
DATE: 3/19/84  
PHOTO NO: 3  
PHOTO TAKEN FROM Explosives  
STORAGE BUNKER AREA  
FACING TOWARDS  
the EAST

COMMENTS:



SITE: UNIVERSAL PROPUSSION  
LOCATION: Phoenix, Arizona  
EPA ID: AZD980814479  
PHOTO TAKEN BY: D. SHANE  
DATE: 3/19/84  
PHOTO NO: 4  
PHOTO TAKEN FROM Explosives  
STORAGE BUNKER AREA  
FACING TOWARDS  
the EAST

COMMENTS:

Bagged waste solid  
propellant labelled  
"scrap plastic grains".





SITE: UNIVERSAL PROPNL

LOCATION: Phoenix, A

EPA ID: AZD9808144

PHOTO TAKEN BY: D. SH

DATE: 3/19/84

PHOTO NO: 5

PHOTO TAKEN FROM Burn

FACING

the north

COMMENTS:



SITE: UNIVERSAL PROPNL

LOCATION: Phoenix, Arizona

EPA ID: AZD980814479

PHOTO TAKEN BY: P. SHANE

DATE: 3/19/84

PHOTO NO: 6

PHOTO TAKEN FROM BURN AREA

FACING TOWARD

the north

COMMENTS:

Photo of A Burn pit.





SITE: UNIVERSAL PROPUSSION  
LOCATION: Phoenix, Arizona  
EPA ID: AZD980814479  
PHOTO TAKEN BY: D. SHANE  
DATE: 3/19/84  
PHOTO NO: 7  
PHOTO TAKEN FROM BURN AREA

                     FACING TOWARDS

THE WEST

COMMENTS:

photo of typical Burn  
residue material.



SITE: UNIVERSAL PROPUSSION  
LOCATION: Phoenix, Arizona  
EPA ID: AZD980814479  
PHOTO TAKEN BY: D. SHANE  
DATE: 3/19/84  
PHOTO NO: 8  
PHOTO TAKEN FROM Chemical  
Storage Area

                     FACING TOWARDS

THE NORTH

COMMENTS:

SPENT SOLVENTS IN STEEL  
55 GALLON DRUMS ARE  
BEING DISPOSED OF BY  
SOLAR EVAPORATION.



Mandel 7-3-2

18 MAR 1984

**NOTICE LETTER**

In Reply T-2-1  
Refer to: AZD980814479

Norm Weiss, Acting Chief  
Bureau of Waste Control  
Arizona Department of Health Services  
1740 West Adams Street  
Phoenix, AZ 85007

Dear Mr. Weiss:

On March 19, 1984, a hazardous waste inspection was conducted at Universal Propulsion Company, Inc., 5401 North Central Avenue, Phoenix, Arizona (AZD980814479) by Daniel Shane of our Field Inspections Section and Cynthia Allison of the Bureau of Waste Control. During the course of the inspection, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of our inspection report was previously mailed to your office.

The following violations were observed during the records review and facility inspection:

1. ACRR R9-8-1820.D.3, 40 CFR 265.143.  
No financial assurance for closure.
2. ACRR R9-8-1820.E, 40 CFR 265.112(a).  
No closure plan.
3. ACRR R9-8-1820.D.2, 40 CFR 265.13(b).  
No waste analysis plan.
4. ACRR R9-8-1819.A.1, 40 CFR 262.11.  
No hazardous waste determination has been made of the burn residue or spent solvent.
5. **ACRR R9-8-1821.E.4, 40 CFR 265.52.**  
**The Contingency Plan does not contain the names, addresses and phone numbers of emergency coordinators or location and physical description of emergency equipment. A copy of the Contingency Plan is not available at the site or at local emergency organizations.**
6. ACRR R9-8-1821.E, 40 CFR 262.34(a)/40 CFR 265.173(a).  
Drummed spent solvent waste is not stored closed.
7. ACRR R9-8-1821.F, 40 CFR 265.73(b).  
The operating record does not contain records and results of waste analyses, trial tests, monitoring data and operator inspections, or closure cost estimate.

8. ACRR R9-8-1821.E.6.b, 40 CFR 265.174.  
~~Containers~~ are not inspected at least weekly.
9. ~~ACRR R9-8-1821.E.6~~, 40 CFR 265.15(b)(4).  
The inspection schedule does not indicate the frequency of inspections.
10. ACRR R9-8-1821.F.3, 40 CFR 265.15(d).  
No inspection log.
11. 40 CFR 265.382.  
The facility violates the requirement for minimum distance from the location of open burning or detonation to the property of others.

Section II.D of the Phase I Memorandum of Agreement makes it the primary obligation of the State to take timely and appropriate enforcement action against persons in violation of facility standards. This section includes violations detected by Federal compliance evaluation inspections.

EPA believes it is appropriate that the State initiate enforcement action. Please provide us with a copy of your compliance action or evidence of compliance within thirty (30) days of receipt of this letter and report your compliance actions related to this case on your monthly inspection and compliance report.

Should the State fail to take action within the specified time period, EPA will exercise its right to initiate enforcement action under Section 3008(a)(2) of RCRA.

If you have any questions or require additional information, please contact Jane Diamond of my staff at (415)974-0771.

Sincerely yours,

Original Signed by:

Harry Seraydarian  
Director  
Toxics & Waste Management Division

bc: Blais, T-2-1  
Mandel, T-3-2 ✓

*2-Way Memo*

Subject: RCRA INVESTIGATION

**INSTRUCTIONS**

Use routing symbols whenever possible.

**SENDER (Originator of message):**

Use brief, informal language.

Conserve space.

Forward original and one copy.

**RECEIVER (Replier to message):**

Reply below the message, keep one copy, return one copy.

**To :** Phil Bobel, Chief  
 ➔ Toxics and Waste Programs Branch

|                         |                |
|-------------------------|----------------|
| DATE OF MESSAGE         | ROUTING SYMBOL |
| 4/20/84                 | T-2            |
| SIGNATURE OF ORIGINATOR |                |
| <i>Daniel M. Shane</i>  |                |
| TITLE OF ORIGINATOR     |                |
| Field Investigator      |                |

FOLD

## INITIAL MESSAGE

FOLD

Enclosed is a RCRA inspection report for Universal Propulsion Company, Inc. Phoenix, Arizona. This facility was inspected as part of our State overview program.

The inspection disclosed the following deficiencies: No waste analysis plan; Incomplete written inspection schedule; No inspection logs; Inadequate contingency plan; No Closure plan/cost estimates; No weekly inspections of container storage area; Non-compliance with open burning distance requirements.

## REPLY MESSAGE

**From :** Daniel M. Shane, Field Inspections Section T-3-2  
**thru :** Bob Mandel, Chief, Field Inspections Section T-3-2  
 Kathleen Shimmin, Chief, Field Operations Branch T-3

|                                |                |
|--------------------------------|----------------|
| DATE OF REPLY                  | ROUTING SYMBOL |
| SIGNATURE OF REPLIER           |                |
| <i>[Handwritten signature]</i> |                |
| TITLE OF REPLIER               |                |

*2-Way Memo*

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Reply below the message, keep one copy, return one copy.

From : Phil Bobel, Chief  
Toxics and Waste Programs Branch

|                         |                |
|-------------------------|----------------|
| DATE OF MESSAGE         | ROUTING SYMBOL |
| 4/20/84                 | T-2            |
| SIGNATURE OF ORIGINATOR |                |
| <i>Daniel M. Shane</i>  |                |
| TITLE OF ORIGINATOR     |                |
| Field Investigator      |                |

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REPLY MESSAGE

To : Daniel M. Shane, Field Inspections Section T-3-2  
 thru : Bob Mandel, Chief, Field Inspections Section T-3-2  
 Kathleen Shimmmin, Chief, Field Operations Branch T-3

|                      |                |
|----------------------|----------------|
| DATE OF REPLY        | ROUTING SYMBOL |
| SIGNATURE OF REPLIER |                |
| TITLE OF REPLIER     |                |